

Summary of Expected Testimony on the Evaluation of Groundwater Treatment and Water Supply Alternatives for St. Louis Park, Minnesota

Prepared by the State of Minnesota and the United States of America to be submitted to Reilly Tar & Chemical Corporation in accordance with paragraph 6 of the Case Management Order of the Honorable Paul A. Magnuson

I. Background

In August, 1982, the State of Minnesota (State) and the United States of America (United States) retained CH₂M Hill as an expert witness to evaluate groundwater treatment and water supply alternatives for St. Louis Park. Information obtained prior to this date demonstrated that wells in St. Louis Park were contaminated with PAH and resulted in the closure of several municipal drinking water wells. This closure resulted in a reduction in the capacity of St. Louis Park to provide potable water.

The CH2M Hill study was designed to evaluate the feasibility of alternative methods of treating the contaminated water or of otherwise returning St. Louis Park to the capacity which existed before the well closure. The study also provides a recommendation as to which treatment method should be implemented. The background, scope, implementation and results of the study are described in a two-volume report prepared by CH2M Hill, dated November, 1983. The title of the report is "Evaluation of Groundwater Treatment and Water Supply Alternatives for St. Louis Park, Minnesota" (CH2M Hill Report).

II. Availability of CH2M Hill Report.

In compliance with paragraph 6 of the Court's Case Management Order in the Reilly litigation, the State and the United States refer Reilly to the CH_2M Hill Report which they have already produced to Reilly.

III. Names of Experts and Areas of Testimony

The names of the experts who may testify about the evaluation of the groundwater treatment and water supply alternatives for St. Louis Park are:

- A. Michael R. Harris, Project Manager, CH₂M Hill.
- Mr. Harris will be prepared to testify about the following:
 - 1. Background to and purposes of the CH_2M Hill study and Report, including an explanation of the purposes of or introduction to each section of the

study as identified in the Table of Contents at pages 1-2 of the CH₂M Hill Report);

- Literature search and technology assessment described in the CH₂M Hill Report;
- 3. Analysis of the information and data obtained from the study, including, among other analyses, (a) an evaluation of alternative treatment methods which could be implemented to provide full capacity water supply to St. Louis Park and (b) the selection of the recommended water supply alternative for St. Louis Park;
- 4. Responses to proposals or suggestions Reilly may make or information it may generate regarding the design of the recommended water supply alternative for St. Louis Park; and,
- 5. Presence and quantitites of PAH found in the municipal water supplies of Minneapolis, St. Paul, Hopkins and other cities in the United States.
- B. Dean Malotky, Barr Engineering.
- Mr. Malotky will be prepared to testify about the following:

On-site procedures used in well sampling, conducting the on-site treatment investigation, and performing the day-to-day operations required for the pilot scale testing program, including (but not limited to) chain of custody of samples taken.

- C. Harold Cole, GCS Operator, CH₂M Hill.
- Mr. Cole will be prepared to testify about the following:

Analysis of samples taken, including test protocol and actual analytical methodology employed in evaluating the well samples and the water quality in water supplies near St. Louis Park and including the analytical work involved in the various bench scale tests and pilot-scale testing programs undertaken in the study.

- D. Steve Gelman CH₂M Hill.
- Mr. Gelman will be prepared to testify about the following:

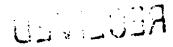
Day-to-day work involved in the bench scale testing program described in section 6 of the CH_2M Hill Report.

- E. Roberta Perry, CH2M Hill.
- Ms. Perry will be prepared to testify about the following:

On-site procedures involved in the day-to-day operations required for the pilot scale testing program.

- F. Alan Gebhardt, Barr Engineering.
- Mr. Gebhardt will be prepared to testify about the following:

Costs associated with Alternatives 2 and 3 as identified at page 3 of the Table of Contents of the CH_2M Hill Report.



DUNS: 00-641-8685	DATE PRINTED	SUMMARY	
REILLY TAR & CHEMICAL CORPORATION	MAY 05 1985	RATING 5A1	
	MFG CHEMICALS	STARTED 1905	
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